

Exhibit P

From: Jeff Gould <Jeff@oandzlaw.com>
Sent: Wednesday, January 5, 2022 3:53 PM
To: Katy Akopjan; Charter-Copyright-QE; Ranahan, Erin; Golinveaux, Jennifer; Anderson, Sean; Elkin, Michael; Alvarez, Cesie; Skopec, Allison; Rosenthal, John; Moore, Jason
Cc: 'Cov-ISP-Service'; ISP Team; Matt Oppenheim; Alex Kaplan; Sperling, Jonathan; Sahni, Neema T
Subject: Warner v. Charter / UMG v. Bright House

Counsel – Plaintiffs’ counsel has just learned today that on November 4, 2021 MarkMonitor located source code for File Hash Manager with revision history dating from June 25, 2012 to April 15, 2016. We are informed that MarkMonitor can make available a copy of this code for Charter’s inspection. Plaintiffs’ counsel will work with you to ensure that happens efficiently and expeditiously. We are investigating this further, including to understand why it was not located or disclosed earlier, but wanted to share what we do know immediately.

We are also informed that MarkMonitor can make available for inspection a copy of source code for Torrent Manager with revision history dating to December 7, 2016, consistent with Mr. Bahun’s deposition testimony in this matter.

To the extent additional information becomes available to Plaintiffs’ counsel, we will promptly let you know.

Regards,
Jeff

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